



UK NANDTB Policy on Level 3 Recertification by Credit System IAW EN 4179

NANDTB 23

Introduction

- EN4179:2009 permits level 3 personnel to be recertified, at intervals not to exceed five years, in accordance with Annex A (credit system) or by successful completion of specific and practical examinations equivalent to initial certification.
- In the UK, all examinations should be conducted by organisations under the general control of the UK NANDTB.
- The Annex A credit system is not within the UK NANDTB scope.....



Should it be?

- Notwithstanding the general references in EN4179 to a NANDTB, the primary remit of the UK NANDTB is to provide general control of all examinations as required by Part 145 AMC 145.A.30(f)4.
- By definition, the credit system is not an examination and therefore out of regulatory scope.
- Control of recertification using the credit system by EU member state NANDTB's and beyond is not harmonised. Imposition of control by the UK NANDTB would disadvantage UK Aerospace industry.



Current Rules for Credit System

- Documentation shall be submitted to the Responsible Level 3 or NANDTB at least 14 days prior to expiration date of current certification.
- Application for recertification by the Responsible Level 3 shall be made directly to the employer, applicable regulatory agency, or applicable NANDTB.
- Is this acceptable and how does it work when the level 3 is the Responsible level 3?

View

- Recertification by the employer without a level 3 review is considered inappropriate.
- The CAA would not want to become the recertification authority and this would also be inappropriate.
- The UK NANDTB does not want to become the recertification authority and legally this could be hazardous.
- BINDT as the recertification authority would be seen as a conflict to it's association with PCN.
- Recertification by Outside Agencies would be at a cost.



UK NANDTB Policy

- Responsible Level 3's review and approve credit system documentation submitted and recertify level 3 individuals on behalf of the employer or make a recommendation for recertification to the employer.
- Responsible Level 3's be recertified by the employer based upon re-qualification from the original Outside Agency or Qualifying Body. This can be either credit system or examination.